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APR 27 2012

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

DeVon Darnell Gleason,
Plaintiff

v.

Northview Village and Makhoulf Suissa,
Defendant(s)

)
)
)
)
) Case No. _____
) (To be assigned by Clerk of District Court)

)
)
) JURY TRIAL DEMANDED
) yes
)

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This employment lawsuit is based on:

Other (Describe)

Sexual Harassment and Retaliation

PARTIES

2. Plaintiff's name: DeVon Darnell Gleason

Plaintiff's address: 201 Robert
Ferguson, MO 63135

Telephone number: 314-324-6915

3. Defendant's info:

Northview Village

2415 North Kingshighway

St Louis Mo 63113

314-361-1300

Makhoulf Suissa

1401 South Brentwood Ste 170

Brentwood MO 63144

314-963-7570

4. If you are claiming that the discriminatory conduct occurred at a different location, please provide the following information:

5. When did the discrimination occur? April 6, 2011 through June 7, 2011

ADMINISTRATIVE PROCEDURES

6. Did you file a charge of discrimination against the defendant(s) with the Missouri Commission on Human Rights? yes. Date Filed: June 15, 2011

7. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?
yes. Date Filed: June 15, 2011

8. Have you received a Notice of Right-to-Sue Letter? yes.
If yes, please attach a copy of the letter to this complaint.

9. If you are claiming age discrimination:

NATURE OF THE CASE

10. The conduct complained of in this lawsuit involves:

- retaliation
- harassment

11. Did you complain about this same conduct in your charge of discrimination? Yes.
I believe that I was discriminated against because of my:

- sexual harassment

Did you state the same reason(s) in your charge of discrimination?

yes

sexual harassment

12. State here, as briefly and clearly as possible, the essential facts of your claim.

Describe specifically the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct. Take time to organize your statement; you may use numbered paragraphs if you find it helpful. It is not necessary to make legal arguments, or to cite cases or statutes.

A. Starting April/2011 I was promoted to full time work by then Dietary Director James Moore. Shortly after, James Moore began to make sexual comments to me. Referencing the size of my buttock and my penis. He then began to call me in his office on several occasions, locking the door once I was in, and chasing me around the office. The final incident was on/or about June 2, 2011 when he called me in his office, locked the door and grabbed my penis while I sat in a chair.

B. I then reported the incident to the SEIU Local 2000 (Deborah Buchanan), Northview Village (Kathy Lorey - Asst. Administrator), Ralph Menees (HR Director). During the reporting of the incident (at Northview) my right to

privacy and confidentiality was violated. James Moore was allowed to enter the office, while my complaint was being made. He was allowed to stand over my in a threaten manning and yell at me, before he was able to be removed from the office. The report was completed and I was told that I was being suspended pending investigation. I was suspended for 7 days.

- C. I was then called back to work, but my hours were cut in half. To date, my hours have not been restored back to the hours I was working before I reported the harassment charges. James Moore was no longer working there when I returned, but was allowed to call into the facility and was present at the facility several times. He continued to threaten me indirectly through his friends and family that were still working there. Judy Deering (Administrator) was well aware of this happening. She called me into her office approximately a month later, handed me a letter written by her that stated my complaint of sexual harassment had been determined to be unwarranted. She continued on to say to me verbally that she was done with it and did not want to hear anymore about it and I was to keep my mouth shut and be glad I had a job. She also said that I needed to have my mother (Annamarie Baker), who works for the corporate office to stop pursuing the complaint.
- D. While waiting on the investigation from the EEOC, a new Dietary Director was hired (Pauline Parker) and she was allowed to bring in new employees and give them more hours than myself. When I complained about this, I was told I was lucky to even have a job.

13. The acts set forth in paragraph 12 of this complaint:
are still being committed by defendant.

14. Additional Information:

I did try and mediate this case, but there was no response from Northview or Mr. Suissa.

REQUEST FOR RELIEF

State briefly and exactly what you want the Court to do for you. Make no legal arguments; cite no cases or statutes.

I would like to the court to have my hours restored back to the hours I was working before the incident. I would like for there to be monetary compensations for all the hours I have lost out on from then to now. I would also like for there to be monetary compensation for the pain and suffering that this incident has caused me and my family.



Signature of Plaintiff

United States District Court Eastern Missouri

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EMPLOYMENT DISCRIMINATION COMPLAINT

DeVon Gleason
April 27, 2012

Verify the accuracy of all information on your forms prior to filing.

Sign and date each form.

Please complete the Civil Cover Sheet with assistance from a deputy clerk at the front counter.

Either file a completed *Motion to Proceed In Forma Pauperis and Financial Affidavit* or submit a check for \$350.00 to cover the filing fee.